



by an uninsured or under-insured motorist. (See Complaint - a copy attached hereto as Exhibit 1).

3. Petitioner seeks removal of this action to this Court on the grounds that the controversy is wholly between citizens of different states and involves an amount in controversy which exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of the interest and costs, pursuant to 28 U.S.C. §1332. In particular, Plaintiffs in the underlying action seek recovery of policy benefits from an umbrella policy Plaintiffs contend provides uninsured or under-insured motorist coverage of \$1,000,000.

4. Plaintiffs are adult resident citizens of Shelby County, Tennessee, and were at the time of the filing of this action and at the time of the removal. Defendant is a corporation organized under the laws of Ohio, with its principal place of business in Ohio. Accordingly, this matter involves citizens of different states.

5. This Notice is filed within the time period prescribed by 28 U.S.C. §1446(b).

6. A copy of the Summons and Complaint, being all the papers served upon Defendant is attached hereto.

WHEREFORE, notice is hereby given that the said Civil Action no. CH-13-0744-1 is removed from the Chancery Court of Shelby County, Tennessee, to this Court.

Respectfully submitted,

s/ E. Jason Ferrell  
**PARKS T. CHASTAIN**  
Registration No. 13744  
**E. JASON FERRELL**  
Registration No. 24425

Attorneys for Defendant

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(615) 256-8787

**CERTIFICATE OF SERVICE**

I hereby certify that on the 28th day of June, 2013, a copy of the foregoing Notice of Removal was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system. The parties to be served are as follows:

R. Sadler Bailey, Esq.  
Tyler D. Parks, Esq.  
Bailey & Greer, PLLC  
6256 Poplar Avenue  
Memphis, TN 38119

s/ E. Jason Ferrell  
**E. JASON FERRELL**